

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

.....
IN RE:

**James E. McNulty and
Michelle McNulty**

Debtors

.....
:
: **CASE NO. 5-17-00968**
:
:
: **CHAPTER 7**
.....

**DEBTORS' ANSWER TO THE MOTION OF
FOR RELIEF FROM THE AUTOMATIC STAY UNDER §362**

Debtors James E. McNulty and Michelle McNulty, through their undersigned counsel, hereby respond to the Motion for Relief from the Automatic Stay filed by Quicken Loans, Inc. as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Strict proof of the averments are required at the time of trial.
5. Denied. Strict proof of the averments are required at the time of trial.
6. Denied. Strict proof of the averments are required at the time of trial.
7. Denied. Strict proof of the averments are required at the time of trial.
8. Denied. Strict proof of the averments are required at the time of trial.
9. Denied. Strict proof of the averments are required at the time of trial.

WHEREFORE, the Debtors, James E. McNulty and Michelle M. McNulty, respectfully request that this Honorable Court enter an Order denying the Relief requested by Quicken Loans, Inc. and for such other and further relief is just and appropriate.

Respectfully submitted,

CONWAY LAW OFFICES, P. C.

/s/ Mark J. Conway
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Attorney for Debtors

DATED: July 17, 2017

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CERTIFICATE OF SERVICE

I, Amy L. Marta, Paralegal hereby certify that I caused a true and correct copy of the foregoing Answer to the Motion for Relief From Automatic Stay Under §362 to be served via e-mail to the following:

John J. Martin, Esq.
Chapter 7 Trustee
1022 Court Street
Honesdale, PA 18431
trusteemartin@martin-law.net

United States Trustee's Office
P.O. Box 969
Harrisburg, PA 18701-0969
ustpreregion03.ha.ecf@usdoj.gov

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CONWAY LAW OFFICES, P.C.

/s/ Amy L. Marta

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DATED: July 17, 2017